

ACKNOWLEDGMENT OF COMPLETION REPORT

FOR

**EMCHEM CORPORATION GLYCOL SPILL
4301 RICE DRIER ROAD
PEARLAND, BRAZORIA COUNTY, TEXAS**

Prepared for

U.S. Environmental Protection Agency

Linda Carter, Project Officer
1445 Ross Avenue
Dallas, Texas 75202

Contract No. EP-W-06-042
TDD No. TO-0001-11-10-02
WESTON W.O. No. 20406.012.001.0682.01
NRC No. 992154
FPN N/A
CERCLIS ID TXD0980750624
EPA OSC: John Martin
START-3 PTL: Derrick Cobb

Submitted by

Weston Solutions, Inc.

Robert Beck, VP, P.E., Program Manager
70 NE Loop 410, Suite 600
San Antonio, Texas 78216
(210) 308-4300

06 January 2012

ACKNOWLEDGMENT OF COMPLETION REPORT

1. PROJECT IDENTIFICATION

Date: 06 January 2012

To: John Martin, On-scene Coordinator (OSC)
U.S. Environmental Protection Agency (EPA)
Region 6, Prevention and Response Branch

Through: Linda Carter, Project Officer (PO)
EPA Region 6, Program Management Branch

Through: Robert Beck, VP, P.E., Weston Solutions, Inc. (WESTON®)
EPA Region 6, Superfund Technical Assessment and Response Team (START-3)
Program Manager

From: Derrick Cobb, WESTON
EPA Region 6, START-3 Project Team Leader

Subject: Acknowledgment of Completion Report: Emchem Corporation Glycol Spill
4301 Rice Drier Road, Pearland, Brazoria County, Texas
Contract No. EP-W-06-042
TDD No. TO-0001-11-10-02
W.O. No. 20406.012.001.0682.01
NRC No. 992154
FPN N/A
CERCLIS ID TXD0980750624
Latitude 29.5753316° North
Longitude 95.2898488° West

Geographic coordinates of the Emchem Corporation Glycol Spill site were determined by START-3 members using an online tool, Google Earth®. The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) identification number for the site is CERCLIS ID TXD0980750624. Texas Commission on Environmental Quality (TCEQ) contacted The National Response Center (NRC Report No. 992154) concerning a triethylene glycol spill at the Emchem Corporation facility. No Federal Pollution Number (FPN) number was issued for this Technical Direction Document (TDD).

2. BACKGROUND INFORMATION

On 10 October 2011 at approximately 23:30 hours, TCEQ contacted the NRC concerning a release of triethylene glycol from the abandoned Emchem Corporation facility located at 4301 Rice Drier Road, Pearland, Brazoria County, Texas. TCEQ reported an uncontrolled release of approximately 3 to 4 gallons-per-minute of the contents from a damaged valve on an aboveground storage tank (AST) having very little to no secondary containment. The drainage pathway for the released material would have allowed the product to migrate to a nearby tributary of Clear Creek that flows downstream and empties into Clear Lake.

Based on initial assessments conducted by TCEQ, the cause of the release is believed to be the result of uneven tank settling due to soft saturated ground complicated by rain on 9 October 2011. Three other 18,000-gallon ASTs have also experienced uneven settling causing concern for the overall structural integrity of those tanks.

3. SUMMARY OF ACTIONS

On 10 October 2011 at approximately 23:30 hours, START-3 and the Emergency and Rapid Response Services (ERRS) Contractor mobilized to the site. Upon arrival, START-3 and ERRS met with the TCEQ representatives on-site. TCEQ had mobilized its Emergency Response Contractor (Oil Mop) to respond to the site to stabilize the release and prevent additional off-site migration. TCEQ was concerned about the volume of product stored in the leaking AST as well as the overall structural integrity of the three other ASTs. Based on these concerns, EPA assumed the lead role in the response effort and tasked ERRS to mobilize the necessary resources to respond to the release.

On 11 October 2011 at approximately 06:00 hours, the ERRS crew arrived on-site and transitioned the response effort with the existing TCEQ contractor. ERRS continued to recover product from the leaking AST and remove free product from the ground. ERRS used a vacuum truck to off-load the contents from the leaking AST and from the other three ASTs with questionable structural integrity. The removed product was transferred into frac tanks for temporary storage until an approved disposal facility could be identified. ERRS utilized a vacuum truck to remove free standing product from the ground when possible. The remaining

product was removed utilizing sorbent pads. ERRS transferred approximately 21,000 gallons of product from the four ASTs.

On 12 October 2011, START-3 and ERRS demobilized from the site until transportation and disposal of the collected product could be arranged for the recovered product.

On 21 November 2011 EPA, START-3, and ERRS remobilized to the site for off-site transportation and disposal of the product stored in the frac tanks and demobilization of equipment. Approximately 21,000 gallons of product and decontamination fluids were transported off-site by Philip Services Corporation (PSC) to Phillip Reclamation Services Houston, LLC located in Houston, Texas. Waste manifests are provided as Attachment F. The frac tanks were demobilized after decontamination. EPA, START-3, and ERRS completed response activities and demobilized from the site on 22 November 2011.

This final report was prepared as part of the requirements of TDD No. TO-0001-11-10-02 and serves as documentation of work completed to date.

4. LIST OF ATTACHMENTS

- A. Site Location Map
- B. Site Area Map
- C. Site Plan
- D. START-3 Site Logbook
- E. Pollution Reports (POLREPs)
- F. Waste Manifests
- G. Digital Photographs
- H. NRC Report 992154
- I. TDD No. TO-0001-11-10-02 and Amendment A

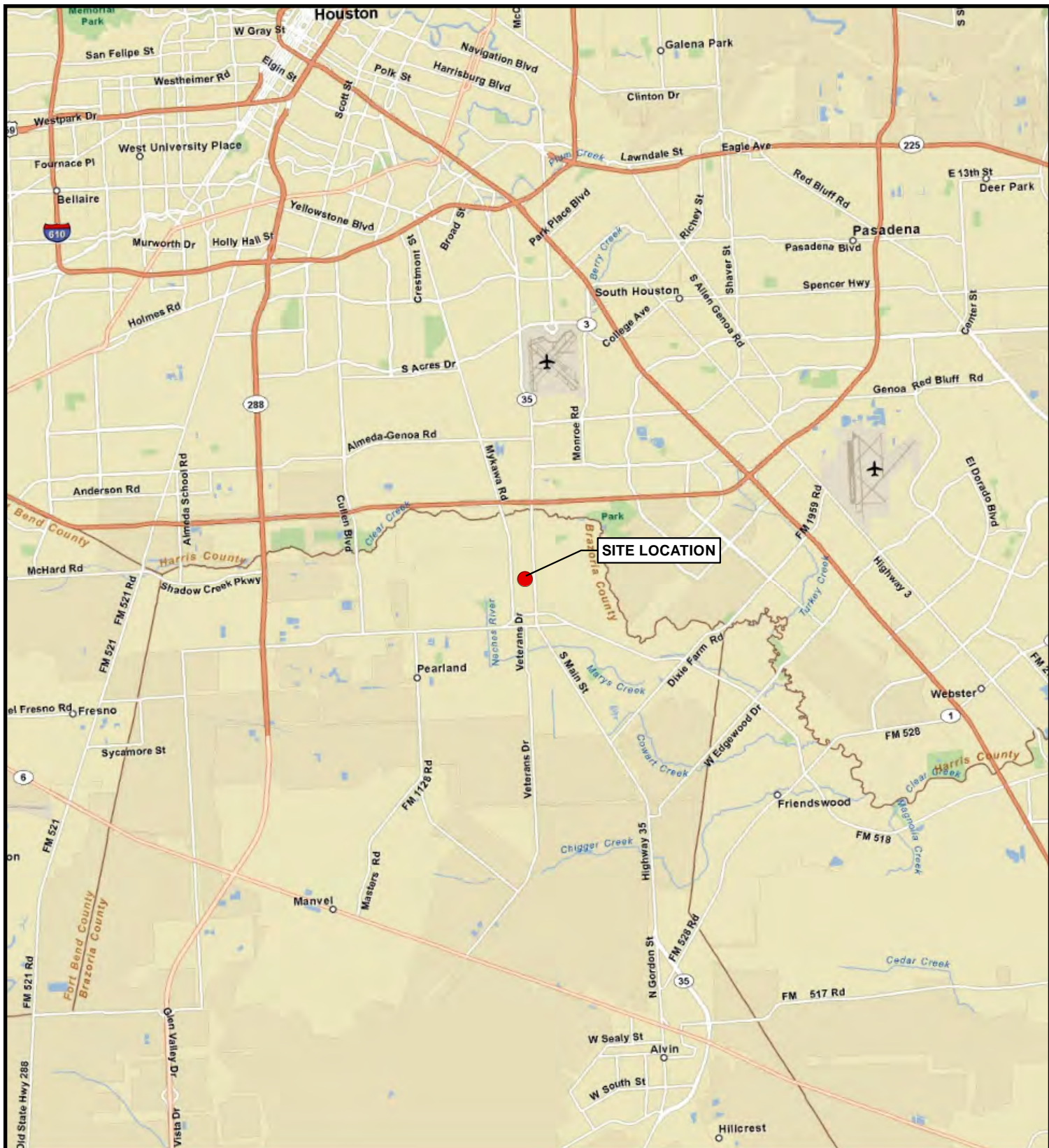
☐

The EPA Task Monitor did not provide final approval of this report prior to the completion date of the work assignment. Therefore, Weston Solutions, Inc. has submitted this report absent the Task Monitor's approval.

☒

The EPA Task Monitor has provided final approval of this report. Therefore, Weston Solutions, Inc. has submitted this report with the Task Monitor's approval.

ATTACHMENT A
SITE LOCATION MAP



LEGEND

● SITE LOCATION



**US EPA REGION 6
START- 3**

**ATTACHMENT A
SITE LOCATION MAP
EMCHEM GLYCOL SPILL
4301 RICE DRIER RD
PEARLAND, BRAZORIA COUNTY, TEXAS**

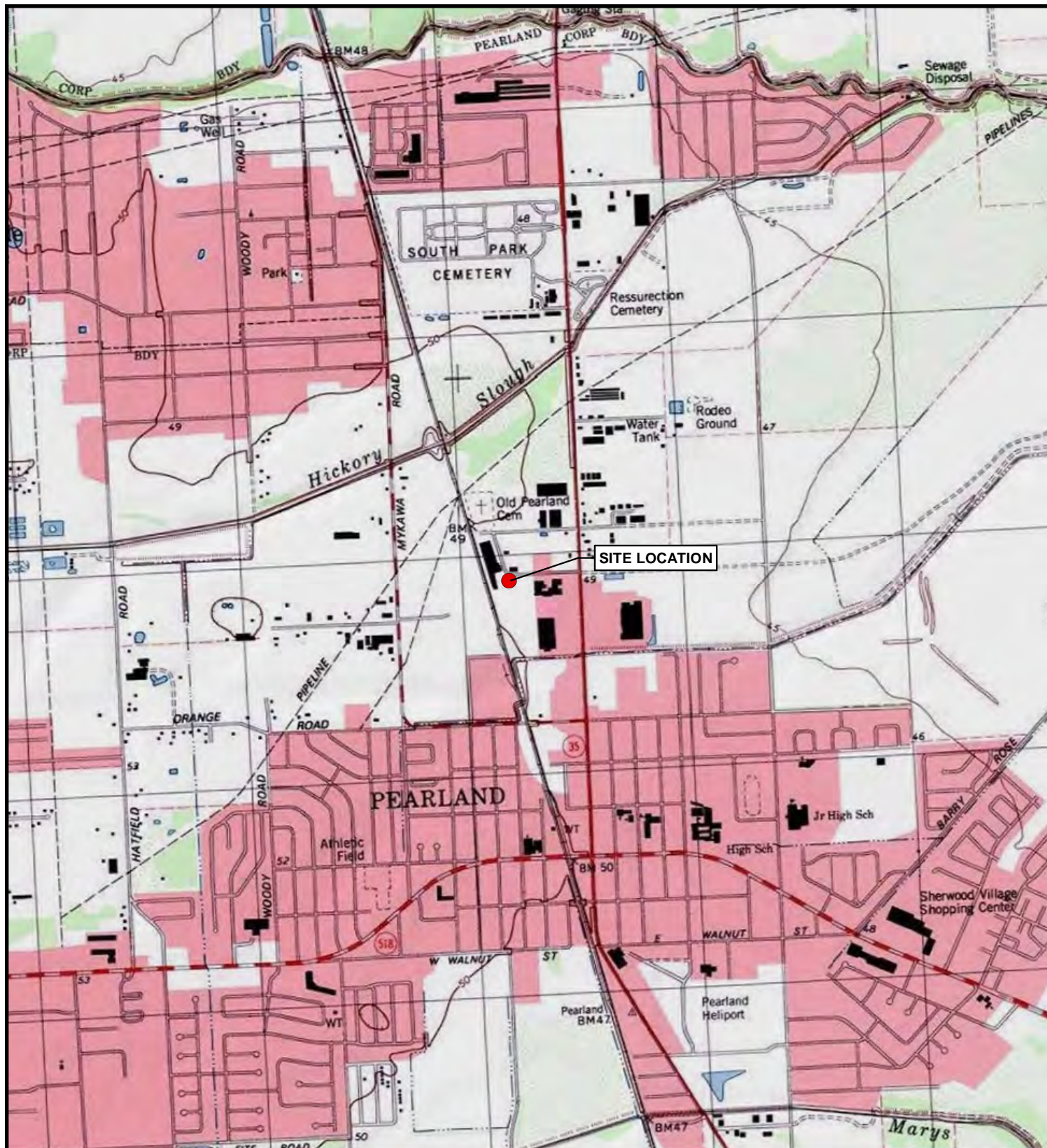
NRC NO: 992154
TDD NO: TO-0001-11-10-02
CERCLIS NO: TXD0980750624

SOURCE: ESRI WORLD STREETMAP SERVICE

| | | |
|------------------|-------------------------------------|-------------------|
| DATE OCT 2011 | PROJECT NO 20406.012.001.0682.01 | SCALE AS SHOWN |
|------------------|-------------------------------------|-------------------|

ATTACHMENT B

SITE AREA MAP



LEGEND

● SITE LOCATION



NRC NO: 992154
TDD NO: TO-0001-11-10-02
CERCLIS NO: TXD0980750624

SOURCE: ESRI WORLD STREETMAP SERVICE



US EPA REGION 6 START- 3

ATTACHMENT B
SITE AREA MAP
EMCHEM GLYCOL SPILL
4301 RICE DRIER RD
PEARLAND, BRAZORIA COUNTY, TEXAS

DATE
OCT 2011

PROJECT NO
20406.012.001.0682.01

SCALE
AS SHOWN

ATTACHMENT C

SITE PLAN



RICE DRIER RD



LEGEND

- AREA OF RESPONSE ACTION
- PROPERTY BOUNDARY



US EPA REGION 6
START- 3

ATTACHMENT C
SITE PLAN

EMCHEM GLYCOL SPILL
4301 RICE DRIER RD
PEARLAND, BRAZORIA COUNTY, TEXAS

NRC NO: 992154
TDD NO: TO-0001-11-10-02
CERCLIS NO: TXD0980750624

SOURCE: ESRI WORLD STREETMAP SERVICE

| DATE | PROJECT NO | SCALE |
|----------|-----------------------|----------|
| OCT 2011 | 20406.012.001.0682.01 | AS SHOWN |

ATTACHMENT D

START-3 SITE LOGBOOK



"Rite in the Rain"[®]
ALL-WEATHER
JOURNAL
No. 391

Emchem Glycol Spill

TDP-TO-0001-11-10-02

20406.012.001.0682.01

210/11/11 TO-0001-11-10-02 20406.012.001.0682.01

EMCHEM GLYCOL SPILL

0000 OSC STEVE MASON ACTIVATES START-3 TO RESPOND TO A TRIETHYLENE GLYCOL SPILL IN PEARLAND TEXAS. TCEQ REQUESTED ASSISTANCE WITH THE RESPONSE. THE LEAK IS OCCURRING FROM A BROKEN VALVE AT THE BOTTOM OF AN 18,000 GALLON AST. 4 TANKS ARE CURRENT LEAKING AT APPROXIMATELY 6°. CONCERN OVER STRUCTURAL INTEGRITY. OSC MASON FORWARDS THE NRC REPORT (992154)

0055 START-CORB ARRIVES ON-SITE. MEETS WITH TCEQ GOODE AND ANDREWS, BRAZORIA COUNTY OFFICE OF EMERGENCY MANAGEMENT, AND CITY OF PEARLAND FIRE MARSHAL'S REPRESENTATIVE. TANK CURRENTLY LEAKING APPROXIMATELY 1-2 GALLONS PER MINUTE. TCEQ CONTRACTOR (OIL MOP COMI) ON-SITE. UTILIZING VACUUM TRUCK TO RECOVER FREE PRODUCT FROM THE GROUND.

0130 START-CORB CONTACTS OSC-MASON TO UPDATE HIM ON CURRENT SITE CONDITIONS. OSC MASON STATES THAT

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20406.012.001.0682.01

3

10/11/11

EMCHEM GLYCOL SPILL

HE HAS ALSO ACTIVATED THE ERRS CONTRACTOR. (EQM)

0140 MATT SALINGER-EQM RESPONSE MANAGER ARRIVES ON-SITE

0145 START/ERRS/TCEQ WALK THE SITE.

NO CHANGE IN SITE CONDITIONS. DMI

CURRENTLY COLLECTING PRODUCT IN A

DIP PAN ARE PRODUCT NO LONGER

BEING RELEASED TO THE GROUND

0245 ERRS/START/TCEQ CONTACT OSC

MASON TO UPDATE HIM ON SITE

CONDITIONS. DISCUSS WHO WILL LEAD

THE EFFORT. (TCEQ & EPA)

0310 ERRS/START/TCEQ CONTACT OSC

MASON. TCEQ REQUESTS EPA

ASSUME THE LEAD FOR THE

RESPONSE. OSC MASON TASKS ERRS

TO MOBILIZE THE NECESSARY

RESOURCES TO THE SITE.

0330 CITY OF PEARLAND GRANTS PERMISSION

PERMISSION TO STAGE FRAC TANKS

ALONG THE ROAD SIDE.

0415 TCEQ CONTRACTOR CONTINUES TO

REMOVE PRODUCT FROM THE LEAKING

4/10/11/11

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ENCHM GLYCOL SPILL

VALUE

0550 EAGLE CONSTRUCTION (ERRS TEAM)

ARRIVES ON-SITE.

0615 ERRS CONDUCTS HEALTH AND SAFETY

MEETING - CHEMICAL OF CONCERN,

BIOLOGICAL HAZARDS, SLIPS/TRIPS/FALLS.

OPERATIONS: CONTINUE RECOVERING

PRODUCT FROM THE LEAKING VALVE.

UTILIZE SORBENT PADS TO RECOVER

FREE PRODUCT FROM THE GROUND.

0700 ERRS TAKES OVER OPERATIONS FROM

THE TCEQ CONTRACTOR.

0805 CITY OF PEARLAND FIRE MARSHAL

DEPARTS THE SITE.

0825 OSC MASON CONTACTS START COBB

UPDATES OSC MASON ON SITE PROGRESS.

0840 ERRS/START CONTACT OSC MASON. ERRS

WILL CONTINUE UTILIZING SORBENT

PADS TO RECOVER FREE PRODUCT FROM

THE GROUND. NO SCRAPPING/EXCAVATION

0910 OSC MASON CONTACTS START COBB

TO CONTACT OSC MARTIN (FIELD OSC/

NEW PRIMARY POINT OF CONTACT)

0920 ERRS AND START CONTACT

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10/11/11

ENCHM GLYCOL SPILL

OSC MARTIN TO DISCUSS THE SITE

OPERATIONS.

0955 ADLER FRAC TANK ARRIVES ON-SITE.

1005 CITY OF PEARLAND FIRE DEPARTMENT

ARRIVES ON-SITE WITH INFRARED

CAMERA TO TRY AND GAUGE PRODUCT

LEVEL WITHIN THE TANKS. UNABLE

TO GAUGE THE TANKS (HEAT DIFFERENTIAL

NOT GREAT ENOUGH).

1015 TCEQ CONTRACTOR EMPTIES VACUUM

TRUCK INTO FRAC TANK. DEPARTS THE

SITE.

1100 ERRS CONTINUES RECOVERING PRODUCT

FROM THE LEAKING VALVE.

1215 START AND ERRS CONDUCT VISUAL

OBSERVATIONS ON TANKS ON-SITE.

(ATTEMPT TO DETERMINE THE AMOUNT OF

PRODUCT STORED ON-SITE).

1400 OSC MARTIN ARRIVES ON-SITE. UPDATE

OSC ON SITE STATUS.

1420 TCEQ ANDREWS ARRIVES ON-SITE

WITH HISTORICAL SITE INFORMATION/

DATA.

1500 ERRS COMPLETES THE TRANSFER

10/11/11

EMCHEM GLYCOL SPILL

OF PRODUCT FROM LEAKING TANK
(WBT). _____

1510 ERRS OFF. LOAD THE VAC TRUCK
INTO ADLER FRAC TANK (4193B) _____

1545 ERRS BEGINS TO TRANSFER
PRODUCT FROM TANK MBT UTILIZING
VACUUM TRUCK. _____

1620 CARE TAKER ARRIVES ON-SITE.
TO PROVIDE HISTORICAL PROCESS
KNOWLEDGE. _____

1700 COMPLETE TOUR WITH CARE TAKER.
ERRS EMPTIES VAC TRUCK INTO
FRAC TANK (4193B). BEGIN _____
SECURING THE SITE. _____

1800 SITE SECURED. DEPART THE SITE.
END OF LOG DAY. _____

[Handwritten signature/initials]

10/12/11

EMCHEM GLYCOL SPILL

0700 START ARRIVIS ON-SITE. Eagle (ERRS TEAM)
ON-SITE: Matt Salenger and crew of 5.
Eagle truck off-loading FRAC TANK A3178C
for day operations. _____

Weather: 70° calm winds, forecast high 90°
It's Meeting: CDC Triethylene Glycol, Slips/
Trips/Falls, high vegetation, snakes, heat
stress, traffic safety. _____

0710 OSC Martin arrives on-site. M. Gallinger
briefs OSC on current site status and
day ops. _____

Work Plan: Pump down and vacuum liquid
located in H tank: WBT, MBT, T-18C
EBT. Transfer liquid into two Frac
tanks located on-site. ERRS tasked
to collect one sample from each
FRAC TANK (4193B, A3178C) for
analysis. GRAF tasked to collect
soil samples from several locations
dehauled by OSC at a later date.

0730 Crews set up vac. truck and
begin pump down operations.

0800 Jim Stagg, overseer of estate,
arrives on-site. OSC Martin

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10/12/11

EM Chem Glycol Spill

briefly Stagg in current ops. STAUT conducts photo documentation of vac operation and ERK tracing area. OSC Martin obtains access agreement from J. Stagg wanting access to site for response. — RA

0830 JCEQ Terry Andrews arrives on site. Reports he has requested additional information on adjacent property containing rice dryers. Samples collected previously from monitoring wells located near adjacent property contained constituents that may not pertain to Echem. — RA

0840 STAUT COBB arrives on site with MSPS for Triethylene glycol. OSC tasked STAUT to prepare initial polrep. Requests site assessment of property at a later date pending funding.

0910 STAUT Agrees: COBB conduct site walk STAUT COBB brings Agrees on site and response history. — RA

0930 Crews off load vac truck into ERK tank. Prepare ops on

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10/12/11

EM Chem Glycol Spill

pump down of 2nd tank for — RA
2nd load. — RA

1000 STAUT utilizes spray paint to identify tanks located on-site using information located on Map provided by JCEQ. STAUT Labels the following tanks:

NA, SA, EBT, T-18, WBT, WBT, B2, W3, S3, S4, N8, S8, TBR, TANKS 1, 2 & 3.

1030 ERKS gauges tank contents of WBT gauges at 10'2". Continue pump-down operations. — RA

1200 ERKS continue pumping down tanks WBT, & EBT. — RA

1230 STAUT COBB departs site for the Western office to develop & upload the Polrep on OSC website. — RA

1330 Crews complete pump down ops on tanks EBT, T-18 and WBT. Liquids transferred to ERK tanks for temp storage. STAUT conducts photo documentation of on-site building and Lab/office located inside the building. — RA

1400 Crews continue pump down of WBT.

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10/12/11

EM Chem Glycol Spill

- 1500 Crews complete pump down of WBT. ERRS collect sample from FRAC tank A4193 B. START conducts photo documentation. ———— RA
- 1510 ERRS collect sample from FRAC tank A3198C. START photo documents. Samples will be submitted to Test America and analyzed for TOTAL SVOCs, VOCs, Metals, Mercury, Cyanide, hex/ chrom: PH. ———— RA
- 1600 Crews prepare site for ER crew demobilization. Lock combination is 4301. ———— RA
- 1630 START departs site. End of log day.

R. Austin

TO-0001-11-10-02

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11/21/11

EMCHEM GLYCOL SPILL

- 0830 START-Cobb arrives at the Weston Regional Equipment Store to pick air monitoring equipment (Multi PRAE). ———— ac
- 0840 Depart the Weston Regional Equipment Store for the project site. ———— ac
- 0900 START-Cobb arrives on-site. Vac Truck on-site. Loading material out of the Frac Tank. Conduct air monitoring from the exhaust of the Vac Truck Pump. ———— ac
- Nothing detected above background. ———— ac
- 10:30 Vac Truck departs the site for Philip Reclamation Services Houston, LLC for disposal. ———— ac
- 14:00 Vac Truck arrives on-site. ———— ac
- 14:10 Begin loading the Vac Truck from the Frac Tank. ———— ac
- 14:30 Vac Truck full. Departs the site for Disposal Facility. ———— ac
- 1500 Vac Truck arrives on-site. ———— ac
- 15:10 Begin loading the Vac Truck from the Frac Tank. ———— ac
- 1545 Vac Truck full departs the site for the disposal facility. ———— ac

D. R. Austin

11/21/11 EMCHEM GLYCOL SPILL

15:50 ERRS begins securing the site. ————ac16:10 START-Cobb departs the site. END
OF LOG DAY. ————ac

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11/21/11

11/21/11 EMCHEM GLYCOL SPILL

0700 START-Cobb arrives on-site. ————ac0725 ERRS Crew arrives on-site. ————ac0730 ERRS Conducts Health and Safety Meeting
Confined Space Entry - Air Monitoring,
Buddy System, Proper PPE, Slips/Trips/Falls,
Low Visibility. ————acSCOPE OF WORK - Decon Frac Tanks, Haul
the remaining Waste, Demob Equipment.0745 Raining on-site. ERRS Preparing
Equipment and Frac Tank for Decon. ————ac0800 BEGIN DECON OF Frac Tank. Crew pumping
rinse water into the second tank for
off-site disposal. ————ac0915 Finish Decon of the Frac Tank. Crew
begins preparing the Frac Tank for Demob.10:00 Frac Tank departs the site. ————ac11:30 Vac Truck arrives on-site. ————ac11:40 Begins Loading the Vac Truck. ————ac12:15 ERRS enters the Frac Tank to Decon
the Tank. ————ac12:40 Complete loading the Vac Truck. ————ac12:50 Vac Truck and Frac Tank depart
the site. ————ac

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11/22/11

11/22/11

EMCHEM GLYCOL SPILL

13:05 START and ERRS depart the site.

END OF LOG DAY.

END

OF

LOG

BOOK

11/22/11

ATTACHMENT E
POLLUTION REPORTS (POLREPs)

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Emchem Glycol Spill - Removal Polrep
 Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI

Subject: POLREP #1
 Response Activities
 Emchem Glycol Spill

Pearland, TX
 Latitude: 29.5753316 Longitude: -95.2898488

To: Ragan Broyles, Superfund Division
 Lawrence Stanton, Office of Emergency Management
 Kelly Crunk, TCEQ

From: John Martin, OSC

Date: 10/12/2011

Reporting Period: 10/11 - 10/12/2011

1. Introduction

1.1 Background

| | |
|--------------------------------------|--|
| Site Number: | Contract Number: |
| D.O. Number: | Action Memo Date: |
| Response Authority: CERCLA | Response Type: Emergency |
| Response Lead: EPA | Incident Category: Removal Action |
| NPL Status: Non NPL | Operable Unit: |
| Mobilization Date: 10/11/2011 | Start Date: 10/11/2011 |
| Demob Date: 10/12/2011 | Completion Date: |
| CERCLIS ID: TXD0980750624 | RCRIS ID: |
| ERNS No.: | State Notification: |
| FPN#: | Reimbursable Account #: |

1.1.1 Incident Category: Emergency Response

1.1.2 Site Description: At approximately 23:30 on 10 October 2011 the Texas Commission on Environmental Quality (TCEQ) contacted the National Response Center (NRC) concerning a release of Triethylene Glycol from the abandoned Emchem Corporation.

1.1.2.1 Location: Emchem Corporation is located at 4301 Rice Drier Road, Pearland, Brazoria County, Texas.

1.1.2.2 Description of Threat: The uncontrolled release of the contents of an AST from an abandoned facility. The AST had very little to no secondary containment. The released material would have eventually migrated to a nearby tributary of Clear Creek which flows to Clear Lake. The primary

chemical of concern is abandoned feedstock used to produce Trieththylene Glycol (TEG).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results: Based on initial assessments, triethylene glycol is leaking at a rate of 3-4 gallons per minute from a failed valve at the bottom of an 18,000 gallon Above Ground Storage Tank (AST). The cause of the leak is believed to be the result of uneven tank settling due to soft saturated ground complicated by recent a rain event on 9 October 2011. Three other 18,000 gallon ASTs have also experienced uneven settling causing concern for the overall structural integrity of those tanks.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative: At approximately 23:30 on 10 October 2011 TCEQ contacted the NRC (Incident Report # 992154) concerning the release of Triethylene Glycol (TEG) due to a leaking valve at a tank farm. Initial reports indicated that 3,000 gallons of material have been released with an estimated 1,800 gallons having flowed off-site into a drainage ditch located on the north side of the site. The leak is on-going at an approximate rate of 3-4 gallons per minute. Shortly after midnight on 11 October 2011, the EPA Phone Duty Officer activated the START and ERRS contractors to immediately respond to the site.

2.1.2 Response Actions to Date: Upon arrival at the site START and ERRS met with the TCEQ representatives on-site. TCEQ had mobilized one of their Emergency Response contractors to respond to the site, in an attempt to stabilize and prevent additional off-site migration. The TCEQ contractor was recovering product from the leaking valve as well as free standing product from the ground. TCEQ was also concerned about the structural integrity of the tanks and a possible tank failure as a result of one of the leaning tanks.

Based on these concerns TCEQ requested that EPA assume the lead for the emergency response. EPA tasked the ERRS contractor with mobilizing a crew to the site to continue the response efforts. At approximately 06:00 hours the ERRS crew arrived on-site and transitioned the response effort with the existing TCEQ contractor.

At approximately 08:00 hours a more detailed site investigation was conducted and it was determined that no product had migrated off-site as originally reported. The ERRS contractor continued removing product from the leaking tank as well as recovering free product from the ground.

At approximately 15:00 the ERRS contractor completed the transfer of the product from the leaking tank to a Frac Tank that was mobilized to the site for temporary storage. At approximately 15:45 ERRS began transferring product from a second tank to minimize the potential for tank failure as a result of the questionable structural integrity of the ASTs.

At 17:45 approximately 8,000 gallons of product had been transferred to the Frac Tank for temporary storage. The site was secured and the EPA crews left the site at 18:00 for the night.

At 07:00 hours on 12 October 2011, EPA, START, the ERRS contractor, and TCEQ mobilized to the site to continue response actions. A second Frac Tank was mobilized to the site for temporary storage. Crews continued pump down operations to transfer product from the three remaining ASTs to the Frac Tanks. Operations continued until 15:00 hours at which time the liquids were removed from the remaining ASTs. ERRS contractors collected a sample from each Frac Tank for waste profiling analyzing for VOCs, SVOCs, Mercury, Cyanide, Hexavalent Chromium, and pH. START conducted photo documentation of the contents located inside the metal building on-site. At 16:45 hours the site was secured and the ER crew demobed from the site.

2.1.3 Enforcement Activities: The owner/operator of the facility has been deceased for two years. Prior to his death, he had been in litigation with TCEQ for more than 20 years regarding regulations pertinent to facility operations. While the family heirs decided not to take possession of the site because of liability issues, the co-executor of the estate signed site access for the EPA operations.

2.2 Planning Section

Next Steps: The approximately 26,300 gallons of TEG feedstock collected into the frac tanks will be analyzed for disposal profiling and then the waste stream will be properly disposed. A review of the

facility's regulatory files will be completed and then further removal/remedial assessments conducted to address the remaining waste streams remaining onsite.

2.3 Logistics Section

Not relevant.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

Not relevant.

3. Participating Entities

Texas Commission on Environmental Quality - TCEQ
Brazoria County Emergency Management
City of Pearland Fire Marshalls

4. Personnel On Site

10/11/2011: 1 EPA OSC, 1 EPA START Contractor, 9 EPA ERRS Contractors

5. Definition of Terms

Not relevant.

6. Additional sources of information

Not relevant.

7. Situational Reference Materials

Not relevant.

U.S. ENVIRONMENTAL PROTECTION AGENCY
 POLLUTION/SITUATION REPORT
 Emchem Glycol Spill - Removal Polrep
 Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region VI

Subject: POLREP #2
 FINAL
 Emchem Glycol Spill

Pearland, TX
 Latitude: 29.5753316 Longitude: -95.2898488

To: Ragan Broyles, Superfund Division
 Lawrence Stanton, Office of Emergency Management
 Kelly Crunk, TCEQ

From: John Martin, OSC

Date: 11/30/2011

Reporting Period: 11/21 - 11/22/11

1. Introduction

1.1 Background

| | |
|--------------------------------------|--|
| Site Number: | Contract Number: |
| D.O. Number: | Action Memo Date: |
| Response Authority: CERCLA | Response Type: Emergency |
| Response Lead: EPA | Incident Category: Removal Action |
| NPL Status: Non NPL | Operable Unit: |
| Mobilization Date: 10/11/2011 | Start Date: 10/11/2011 |
| Demob Date: 10/12/2011 | Completion Date: |
| CERCLIS ID: TXD0980750624 | RCRIS ID: |
| ERNS No.: | State Notification: |
| FPN#: | Reimbursable Account #: |

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2. Current Activities

2.1 Operations Section

2.1.1 Narrative: At approximately 23:30 on 10 October 2011 TCEQ contacted the NRC (Incident Report # 992154) concerning the release of Triethylene Glycol (TEG) due to a leaking valve at a tank farm. Initial reports indicated that 3,000 gallons of material have been released with an estimated 1,800 gallons having flowed off-site into a drainage ditch located on the north side of the site. The leak is on-going at an approximate rate of 3-4 gallons per minute. Shortly after midnight on 11 October 2011, the EPA Phone Duty Officer activated the START and ERRS contractors to immediately respond to the site.

2.1.2 Response Actions since last POLREP: On 21 November 2011 EPA, ERRS, and START remobilized to the site to dispose of the material stored in the Frac Tanks, decontaminate the Frac Tanks, and demobilize the tanks from the site. Approximately 21,000 gallons of material and decontamination water was hauled off-site for disposal at the the Philip Reclamation Services Houston, LLC facility located in Houston Texas.

On 22 November 2011 at approximately 13:00 hours EPA, ERRS, and START demobed the remaining equipment completing the emergency response phase of the project.

2.1.3 Enforcement Activities: The owner/operator of the facility has been deceased for two years. Prior to his death, he had been in litigation with TCEQ for more than 20 years regarding regulations pertinent to facility operations. While the family heirs decided not to take possession of the site because of liability issues, the co-executor of the estate signed site access for the EPA operations.

2.2 Planning Section

Next Steps: A more detailed assessment and sampling of the remaining material(s) stored on-site is recommended to be conducted at the Site for possible furthur removal activities.

2.3 Logistics Section

Not relevant.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

Not revelant.

3. Participating Entities

Texas Commission on Environmental Quality - TCEQ
Brazoria County Emergency Management
City of Pearland Fire Marshalls

4. Personnel On Site

10/11/2011: 1 EPA OSC, 1 EPA START Contractor, 9 EPA ERRS Contractors

5. Definition of Terms

Not applicable.

6. Additional sources of information

Not relevant.

7. Situational Reference Materials

Not relevant.

ATTACHMENT F

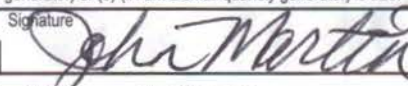
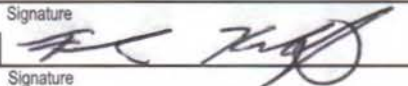
WASTE MANIFESTS

561330

1406990

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

| | | | | | | | |
|---|---|--|---|--|---|-------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number TXD980750624 | 2. Page 1 of 1 | 3. Emergency Response Phone (877) 577-2669 | 4. Manifest Tracking Number 008787927 JJK | | |
| 5. Generator's Name and Mailing Address USEPA/EM CHEM CORP 1445 ROSS AVE. SUITE 1200 (6SF-PE) DALLAS TX 75202 (214)665-6748 | | | Generator's Site Address (if different than mailing address) USEPA/EM CHEM CORP RT 3 W END OF RICE DRYER ROAD PEARLAND TX 77581 (214)665-6748 | | | | |
| 6. Transporter 1 Company Name PHILIP RECLAMATION SERVICES-HOUSTON LLC | | | U.S. EPA ID Number TXD074196338 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address PHILIP RECLAMATION SERVICES HOUSTON, LLC 4050 HOMESTEAD ROAD HOUSTON, TX 77028 (713) 674-2406 | | | U.S. EPA ID Number TXD074196338 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | | | No. | Type | | | |
| | 1. | NON DOT/NON RCRA REGULATED LIQUID (TRIETHYLENE GLYCOL) | 001 | TT | 5000 | kg | FR4V2071 |
| | 2. | | | | | | |
| | 3. | | | | | | |
| 4. | | | | | | | |
| 14. Special Handling Instructions and Additional Information (1) 519938-00 - TRIETHYLENE GLYCOL <div style="text-align: right; font-size: 1.2em;">PO#18108</div> | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offor's Printed/Typed Name John Martin U.S.EPA fosc | | | Signature  | | Month Day Year 11 21 11 | | |
| INT'L | 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. | | Port of entry/exit: _____ Date leaving U.S.: _____ | | | | |
| | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | |
| TRANSPORTER | Transporter 1 Printed/Typed Name Frank Kelly | | Signature  | | Month Day Year 11 21 11 | | |
| | Transporter 2 Printed/Typed Name | | Signature | | Month Day Year | | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | |
| | Manifest Reference Number: _____ | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | |
| | Facility's Phone: _____ | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. H141 | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name | | | Signature | | | Month Day Year | |

561382

1407070

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Form Approved. OMB No. 2050-0039

| | | | | | | | |
|--|---|--|---|--|---|-------------------|-----------------|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number TXD980750624 | 2. Page 1 of 1 | 3. Emergency Response Phone (877) 577-2669 | 4. Manifest Tracking Number 008787928 JJK | | |
| 5. Generator's Name and Mailing Address USEPA/EM CHEM CORP 1445 ROSS AVE. SUITE 1200 (6SF-PE) DALLAS TX 75202 (214)665-6748 | | | Generator's Site Address (if different than mailing address) USEPA/EM CHEM CORP RT 3 W END OF RICE DRYER ROAD PEARLAND TX 77581 (214)665-6748 | | | | |
| 6. Transporter 1 Company Name PHILIP RECLAMATION SERVICES-HOUSTON LLC | | | U.S. EPA ID Number TXD074196338 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address PHILIP RECLAMATION SERVICES HOUSTON, LLC 4050 HOMESTEAD ROAD HOUSTON, TX 77028 (713) 674-2406 | | | U.S. EPA ID Number TXD074196338 | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes |
| | 1. | NON DOT/NON RCRA REGULATED LIQUID (TRIETHYLENE GLYCOL) | 1 TT | | 38000 | P | FR4V2071 |
| | 2. | | | | | | |
| | 3. | | | | | | |
| | 4. | | | | | | |
| 14. Special Handling Instructions and Additional Information (1) 519938-00 - TRIETHYLENE GLYCOL PO # 18108 | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offoror's Printed/Typed Name John Martin | | Signature John Martin | | Month Day Year 11 21 11 | | | |
| INT'L | 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. | | Port of entry/exit: Date leaving U.S.: | | | | |
| | Transporter signature (for exports only): | | | | | | |
| TRANSPORTER | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | |
| | Transporter 1 Printed/Typed Name Frank Kelly | | Signature Frank Kelly | | Month Day Year 11 21 11 | | |
| DESIGNATED FACILITY | Transporter 2 Printed/Typed Name | | Signature | | Month Day Year | | |
| | 18. Discrepancy | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | |
| | Manifest Reference Number: | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | |
| Facility's Phone: | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. H141 | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name | | Signature | | Month Day Year | | | |

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1407071

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Form Approved. OMB No. 2050-0039

| | | | | | | | | | | | |
|--|---|---|--|---|--|--|--|---|-------------------|-----------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number TXD980750624 | | 2. Page 1 of 1 | | 3. Emergency Response Phone (877) 577-2669 | | 4. Manifest Tracking Number 008787929 JJK | | | |
| | | 5. Generator's Name and Mailing Address USEPA/EN CHEM CORP 1445 ROSS AVE. SUITE 1200 (6SF DALLAS TX 75202 (214)665-6748 | | Generator's Site Address (if different than mailing address) USEPA/EN CHEM CORP RT 3 W END OF RICE DRYER ROAD PEARLAND TX 77581 (214)665-6748 | | | | | | | |
| 6. Transporter 1 Company Name PHILIP RECLAMATION SERVICES-HOUSTON LLC | | U.S. EPA ID Number TXD074196338 | | | | | | | | | |
| 7. Transporter 2 Company Name | | U.S. EPA ID Number | | | | | | | | | |
| 8. Designated Facility Name and Site Address PHILIP RECLAMATION SERVICES HOUSTON, LLC 4050 HOMESTEAD ROAD HOUSTON, TX 77028 (713) 674-2406 | | U.S. EPA ID Number TXD074196338 | | | | | | | | | |
| GENERATOR | 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | | | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes | |
| | 1. | NON DOT/NON RCRA REGULATED LIQUID (TRIETHYLENE GLYCOL) | | | | 001 TT | | 5000 | G | FR4V2071 | |
| | 2. | | | | | | | | | | |
| | 3. | | | | | | | | | | |
| | 4. | | | | | | | | | | |
| 14. Special Handling Instructions and Additional Information (1) 519938-00 - TRIETHYLENE GLYCOL PO# 18108 | | | | | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | | | | |
| Generator's/Officer's Printed/Typed Name John Martin U.S. EPA FOSC | | | | | | | | | | | |
| Signature <i>John Martin</i> | | | | | | | | | | | |
| Month Day Year 11 21 11 | | | | | | | | | | | |
| TRANSPORTER | 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ | | | | | | | | | | |
| | 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | | | | |
| | Transporter 1 Printed/Typed Name Victor Ferrufino | | | | | | | | | | |
| Signature <i>Victor Ferrufino</i> | | | | | | | | | | | |
| Month Day Year 11 21 11 | | | | | | | | | | | |
| Transporter 2 Printed/Typed Name | | | | | | | | | | | |
| Signature | | | | | | | | | | | |
| Month Day Year | | | | | | | | | | | |
| DESIGNATED FACILITY | 18. Discrepancy | | | | | | | | | | |
| | 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | | | | |
| | Manifest Reference Number: | | | | | | | | | | |
| | 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | | | | | |
| | Facility's Phone: | | | | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) | | | | | | | | | | | |
| Month Day Year | | | | | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | | | | |
| 1. H141 | | 2. | | 3. | | 4. | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | | | | |
| Printed/Typed Name | | | | | | | | | | | |
| Signature | | | | | | | | | | | |
| Month Day Year | | | | | | | | | | | |

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Form Approved. OMB No. 2050-0039

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|---|--|---|--|--------------------------|--|--|--|---|--|-------------------|--|-----------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number TXD980750624 | | 2. Page 1 of 1 | | 3. Emergency Response Phone (877) 577-2669 | | 4. Manifest Tracking Number 008787930 JJK | | | | | |
| | | 5. Generator's Name and Mailing Address USEPA/EN CHEM CORP 1445 ROSS AVE, SUITE 1200 (6SF DALLAS TX 75202 (214)665-6748 | | | | | | Generator's Site Address (if different than mailing address) USEPA/EN CHEM CORP RT 3 W END OF RICE DRYER ROAD PEARLAND TX 77581 (214)665-6748 | | | | | |
| 6. Transporter 1 Company Name PHILIP RECLAMATION SERVICES-HOUSTON LLC | | U.S. EPA ID Number TXD074196338 | | | | | | | | | | | |
| 7. Transporter 2 Company Name | | U.S. EPA ID Number | | | | | | | | | | | |
| 8. Designated Facility Name and Site Address PHILIP RECLAMATION SERVICES HOUSTON, LLC 4050 HOMESTEAD ROAD HOUSTON, TX 77028 (713) 674-2406 | | U.S. EPA ID Number TXD074196338 | | | | | | | | | | | |
| 9a. HM | | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | | | | 10. Containers | | 11. Total Quantity | | 12. Unit Wt./Vol. | | 13. Waste Codes | |
| | | | | | | No. Type | | | | | | | |
| 1. NON DOT/NON RCRA REGULATED LIQUID (TRIETHYLENE GLYCOL) | | | | | | 001 TT | | 2200 | | 61 | | FR4V2071 | |
| 2. | | | | | | | | | | | | | |
| 3. | | | | | | | | | | | | | |
| 4. | | | | | | | | | | | | | |
| 14. Special Handling Instructions and Additional Information (1) 519938-00 - TRIETHYLENE GLYCOL <div style="text-align: right;">PO# 18108</div> | | | | | | | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | | | | | | | |
| Generator's/Offoror's Printed/Typed Name John Martin U.S. EPA POSC Signature <i>John Martin</i> Month 11 Day 22 Year 11 | | | | | | | | | | | | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: | | | | | | | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | | | | | | | |
| Transporter 1 Printed/Typed Name Frank Kelly Signature <i>Frank Kelly</i> Month 11 Day 21 Year 11 | | | | | | | | | | | | | |
| Transporter 2 Printed/Typed Name Signature Month Day Year | | | | | | | | | | | | | |
| 18. Discrepancy | | | | | | | | | | | | | |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | | | | | | | |
| Manifest Reference Number: | | | | | | | | | | | | | |
| 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | | | | | | | | |
| Facility's Phone: | | | | | | | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | | | | | | | |
| 1. H141 2. 3. 4. | | | | | | | | | | | | | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | | | | | | | |
| Printed/Typed Name Signature Month Day Year | | | | | | | | | | | | | |

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Form Approved. OMB No. 2050-0039

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|--|--|--|--|---|--|-----------------|--|
| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator ID Number TXD980750624 | 2. Page 1 of 1 | 3. Emergency Response Phone (877) 577-2669 | 4. Manifest Tracking Number 008787935 JJK | | |
| 5. Generator's Name and Mailing Address USEPA/EM CHEM CORP 1445 ROSS AVE. SUITE 1200 (6SF - PE) DALLAS TX 75202 (214)665-6748 | | | Generator's Site Address (if different than mailing address) USEPA/EM CHEM CORP RT 3 W END OF RICE DRYER ROAD PEARLAND TX 77581 (214)665-6748 | | | | |
| 6. Transporter 1 Company Name PHILIP RECLAMATION SERVICES-HOUSTON LLC | | | U.S. EPA ID Number TXD074196338 | | | | |
| 7. Transporter 2 Company Name | | | U.S. EPA ID Number | | | | |
| 8. Designated Facility Name and Site Address PHILIP RECLAMATION SERVICES HOUSTON, LLC 4050 HOMESTEAD ROAD HOUSTON, TX 77028 (713) 674-2406 | | | U.S. EPA ID Number TXD074196338 | | | | |
| 9a. HM | 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) | 10. Containers No. Type | | 11. Total Quantity | 12. Unit Wt./Vol. | 13. Waste Codes | |
| 1. | NON DOT/NON RCRA REGULATED LIQUID (TRIETHYLENE GLYCOL) | 1 TT | | 5000 | G | FR4V2071 | |
| 2. | | | | | | | |
| 3. | | | | | | | |
| 4. | | | | | | | |
| 14. Special Handling Instructions and Additional Information (1) 519938-00 - TRIETHYLENE GLYCOL PO# 18108 | | | | | | | |
| 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. | | | | | | | |
| Generator's/Offor's Printed/Typed Name John Martin U.S. EPA FOSC | | Signature John Martin | | Month Day Year 11 21 11 | | | |
| 16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.: | | | | | | | |
| 17. Transporter Acknowledgment of Receipt of Materials | | | | | | | |
| Transporter 1 Printed/Typed Name Victor Ferrufino | | Signature Victor Ferrufino | | Month Day Year 11 21 11 | | | |
| Transporter 2 Printed/Typed Name | | Signature | | Month Day Year | | | |
| 18. Discrepancy | | | | | | | |
| 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection | | | | | | | |
| Manifest Reference Number: | | | | | | | |
| 18b. Alternate Facility (or Generator) U.S. EPA ID Number | | | | | | | |
| Facility's Phone: | | | | | | | |
| 18c. Signature of Alternate Facility (or Generator) Month Day Year | | | | | | | |
| 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) | | | | | | | |
| 1. H141 | | 2. | | 3. | | 4. | |
| 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a | | | | | | | |
| Printed/Typed Name | | Signature | | Month Day Year | | | |

ATTACHMENT G DIGITAL PHOTOGRAPHS

To View Photographs:

1) Open the Folder: Attachment G - Digital Photographs

2) Double click on the Icon (in the folder):





Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111011-001
Photo Type: OV
Direction: S
Date/Time: Oct 11 2011 2:42AM
Latitude: 0
Longitude: 0
Photographer: Derrick Cobb
Witness: Derrick Cobb
Caption: Overview of leaking tank



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-002

Photo Type: OV

Direction: N

Date/Time: Oct 11 2011 2:43AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: TCEQ contractor recovering product from the broken valve on tank WBT



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-005

Photo Type: OV

Direction: NW

Date/Time: Oct 11 2011 7:14AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: ERRs contractor utilizing sorbent pads to recover free product from the ground



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111011-006
Photo Type: OV
Direction: E
Date/Time: Oct 11 2011 7:21AM
Latitude: 0
Longitude: 0
Photographer: Derrick Cobb
Witness: Derrick Cobb
Caption: Overview of the leaning tanks



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-007

Photo Type: OV

Direction: S

Date/Time: Oct 11 2011 7:23AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: Overview of tanks located on-site. The 4 taller tanks in the background are the tanks of concern.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111011-008
Photo Type: OV
Direction: W
Date/Time: Oct 11 2011 7:25AM
Latitude: 0
Longitude: 0
Photographer: Derrick Cobb
Witness: Derrick Cobb
Caption: Overview of site



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-009

Photo Type: OV

Direction: NW

Date/Time: Oct 11 2011 7:38AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: ERRs contractor recovering free product from the ground



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-010

Photo Type: OV

Direction: W

Date/Time: Oct 11 2011 7:43AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: Berms placed in the drainage ditch on the North side of the site by Brazoria County



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111011-011

Photo Type: OV

Direction: S

Date/Time: Oct 11 2011 7:44AM

Latitude: 0

Longitude: 0

Photographer: Derrick Cobb

Witness: Derrick Cobb

Caption: Berms placed in the drainage ditch on the East side of the site by Brazoria County



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111011-012
Photo Type: OV
Direction: SW
Date/Time: Oct 11 2011 10:04AM
Latitude: 0
Longitude: 0
Photographer: Derrick Cobb
Witness: Derrick Cobb
Caption: ERRs vacuum truck being utilized



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-025

Photo Type: OV

Direction: N

Date/Time: Oct 12 2011 11:08AM

Latitude: 0

Longitude: 0

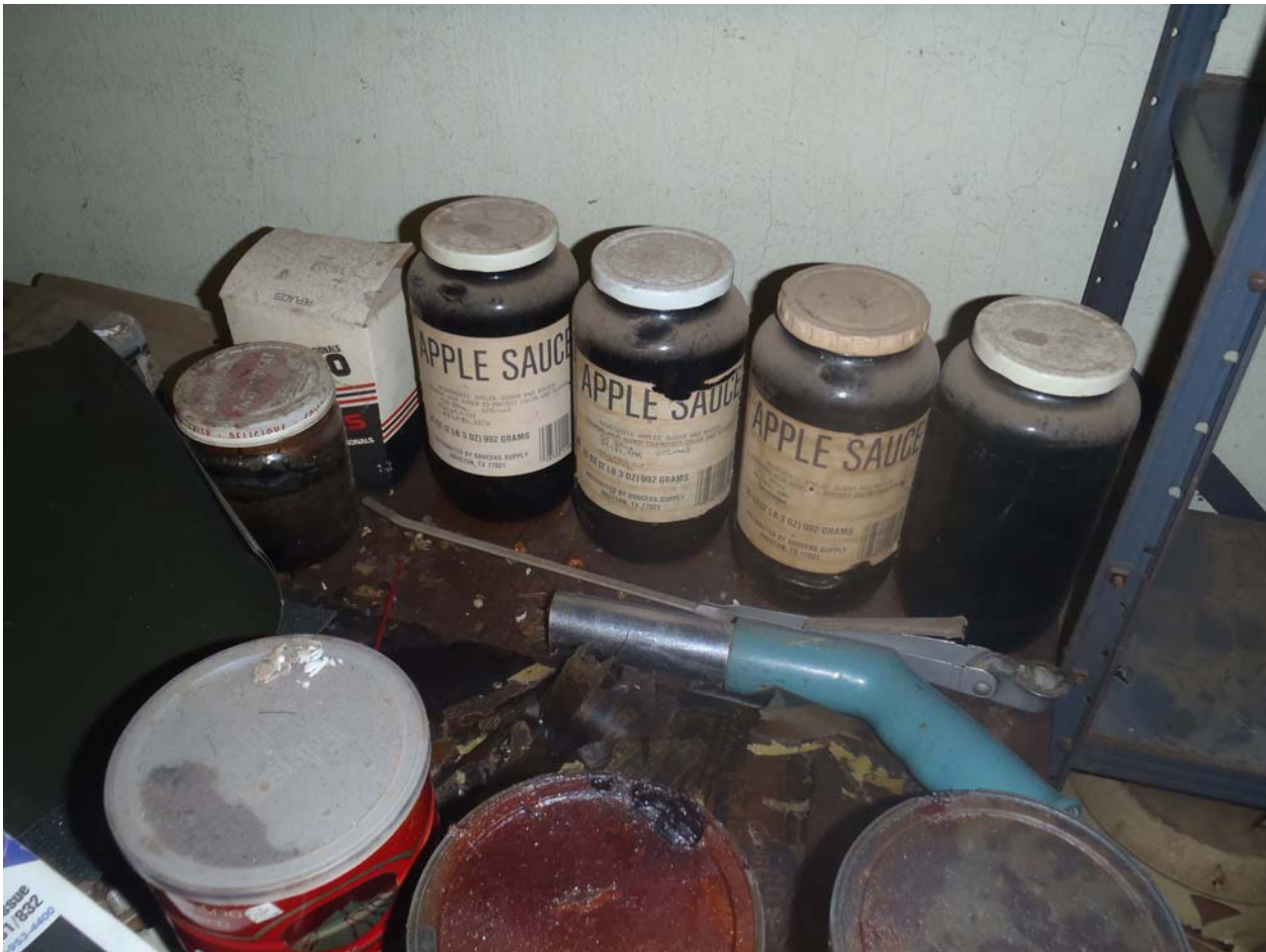
Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: ERRs contractor removing liquid product from the 4 tanks located on-site and pumping the material into a FRAC Tank. Two FRAC Tanks were mobilized to the site to store the product until disposal.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111012-035
Photo Type: OV
Direction: SW
Date/Time: Oct 12 2011 1:35PM
Latitude: 0
Longitude: 0
Photographer: Rebecca Ayres
Witness: Rebecca Ayres
Caption: The lab/office of an on-site building located on the property.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-033

Photo Type: OV

Direction: N

Date/Time: Oct 12 2011 1:35PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Unknown liquid stored in various bottles inside the lab/office of an on-site building located on the property.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-038

Photo Type: OV

Direction: SE

Date/Time: Oct 12 2011 1:36PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Additional view of items stored within the on-site building located on the property.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-036

Photo Type: OV

Direction: S

Date/Time: Oct 12 2011 1:36PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Various containers stored within the on-site building located on the property.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-037

Photo Type: OV

Direction: NW

Date/Time: Oct 12 2011 1:36PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Numerous items containing unknown liquid and solid materials.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111012-041
Photo Type: OV
Direction: SW
Date/Time: Oct 12 2011 1:37PM
Latitude: 0
Longitude: 0
Photographer: Rebecca Ayres
Witness: Rebecca Ayres
Caption: Abandoned drums and other containers.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111012-040
Photo Type: OV
Direction: S
Date/Time: Oct 12 2011 1:37PM
Latitude: 0
Longitude: 0
Photographer: Rebecca Ayres
Witness: Rebecca Ayres
Caption: Abandoned drum and other containers.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111012-042
Photo Type: OV
Direction: NW
Date/Time: Oct 12 2011 1:37PM
Latitude: 0
Longitude: 0
Photographer: Rebecca Ayres
Witness: Rebecca Ayres
Caption: Various bottles containing unknown liquid.



Event Name: Emchem Glycol Spill
Incident Name: Emchem Glycol Spill
Photo Name: 20111012-043
Photo Type: OV
Direction: W
Date/Time: Oct 12 2011 1:40PM
Latitude: 0
Longitude: 0
Photographer: Rebecca Ayres
Witness: Rebecca Ayres
Caption: Various bottles containing unknown liquid.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-047

Photo Type: OV

Direction: NE

Date/Time: Oct 12 2011 1:41PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Numerous bottles located on a shelf within the lab. Contents: Unknown.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-046

Photo Type: OV

Direction: W

Date/Time: Oct 12 2011 1:41PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Numerous bottles containing unknown liquid stored within the lab.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-044

Photo Type: OV

Direction: SW

Date/Time: Oct 12 2011 1:41PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Close up view of various bottles containing unknown liquid.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-056

Photo Type: OV

Direction: NE

Date/Time: Oct 12 2011 2:19PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: View of the 4 tanks product was removed from and placed into FRAC tanks for disposal.



Event Name: Emchem Glycol Spill

Incident Name: Emchem Glycol Spill

Photo Name: 20111012-058

Photo Type: OV

Direction: NE

Date/Time: Oct 12 2011 2:20PM

Latitude: 0

Longitude: 0

Photographer: Rebecca Ayres

Witness: Rebecca Ayres

Caption: Tanks located on-site. Product was removed from the 4 taller tanks and placed into FRAC tanks for disposal.



ATTACHMENT H

NRC REPORT NO. 992154

NATIONAL RESPONSE CENTER 1-800-424-8802

*** For Public Use ***

Information released to a third party shall comply with any applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 992154

INCIDENT DESCRIPTION

*Report taken at 23:49 on 10-OCT-11

Incident Type: STORAGE TANK

Incident Cause: EQUIPMENT FAILURE

Affected Area: DITCH

The incident was discovered on 10-OCT-11 at 16:30 local time.

Affected Medium: WATER DITCH

SUSPECTED RESPONSIBLE PARTY

XX

Type of Organization: UNKNOWN

INCIDENT LOCATION

4301 RICE DRIER RD County: BRAZORIA

City: PEARLAND State: TX

RELEASED MATERIAL(S)

CHRIS Code: TEG Official Material Name: TRIETHYLENE GLYCOL

Also Known As:

Qty Released: 3000 GALLON(S)

Qty in Water: 1500 GALLON(S)

DESCRIPTION OF INCIDENT

CALLER IS REPORTING A RELEASE OF TRIETHYLENE GLYCOL DUE TO A LEAKING VALVE AT A TANK FARM. THE SPILL IS ONGOING AT A RATE OF 2-3 GALLONS PER MINUTE. THERE ARE FOUR ABOVE GROUND STORAGE TANKS EACH WITH A VOLUME OF 18,000 GALLONS. CALLER STATED THAT DUE TO THE RECENT RAIN THE TANKS ARE ON SOFT GROUND AND LEANING AT ABOUT A SIX DEGREE ANGLE.

INCIDENT DETAILS

Description of Tank: STEEL TANK

Tank Above/Below Ground: ABOVE

Transportable Container: NO

Tank Regulated: UNKNOWN

Tank Regulated By:

Tank ID: NONE

Capacity of Tank:

Actual Amount:

---WATER INFORMATION---

Body of Water: DITCH

Tributary of: UNKNOWN

Nearest River Mile Marker:

Water Supply Contaminated: UNKNOWN

DAMAGES

Fire Involved: NO Fire Extinguished: UNKNOWN

INJURIES: NO Hospitalized: Empl/Crew: Passenger:

FATALITIES: NO Empl/Crew: Passenger: Occupant:

EVACUATIONS: NO Who Evacuated: Radius/Area:

Damages: NO

| <u>Closure Type</u> | <u>Description of Closure</u> | <u>Length of Closure</u> | <u>Direction of Closure</u> |
|---------------------|-------------------------------|--------------------------|-----------------------------|
| Air: | N | | |

Road: N

Major
Artery: N

Waterway: N

Track: N

Passengers Transferred: NO

Environmental Impact: UNKNOWN

Media Interest: NONE Community Impact due to Material:

REMEDIAL ACTIONS

DAMS HAVE BEEN PUT IN THE DITCH TO TRY TO CONTAIN THE SPILL.

Release Secured: UNKNOWN

Release Rate: 2-3 GALLON(S) per MINUTE

Estimated Release Duration:

WEATHER

Weather: CLEAR, 70°F

ADDITIONAL AGENCIES NOTIFIED

Federal: NONE

State/Local: TCEQ

State/Local On Scene: NONE

State Agency Number: 20113034

NOTIFICATIONS BY NRC

CALCASIEU PARISH SHERIFF'S DEPT (CRIMINAL INTELLIGENCE UNIT)

11-OCT-11 00:26

DHS NOC (NOC)

11-OCT-11 00:26

DHS PROTECTIVE SECURITY ADVISOR (PSA DESK)

11-OCT-11 00:26

DHS TEXAS FUSION CENTER (INTELLIGENCE OFFICERS)

11-OCT-11 00:26

DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)

11-OCT-11 00:26

U.S. EPA VI (MAIN OFFICE)

11-OCT-11 00:29

GULF STRIKE TEAM (MAIN OFFICE)

11-OCT-11 00:26

JFO-LA (COMMAND CENTER)

11-OCT-11 00:26

NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)

11-OCT-11 00:26

NOAA RPTS FOR TX (MAIN OFFICE)

11-OCT-11 00:26

SECTOR HOUSTON-GALVESTON (COMMAND CENTER)

11-OCT-11 00:30

TCEQ (MAIN OFFICE)

11-OCT-11 00:26

TCEQ (REGION 12)

11-OCT-11 00:26

TX GENERAL LAND OFFICE (MAIN OFFICE)

11-OCT-11 00:26

TX GENERAL LAND OFFICE (TXGLO REGION 2)

11-OCT-11 00:26

TEXAS STATE OPERATIONS CENTER (COMMAND CENTER)

11-OCT-11 00:26

ADDITIONAL INFORMATION

NO ADDITIONAL INFORMATION.

*** END INCIDENT REPORT # 992154 ***

The National Response Center is strictly an initial report taking agency and does not participate in the investigation or incident response. The NRC receives initial reporting information only and notifies Federal and State On-Scene Coordinators for response. The NRC does not verify nor does it take follow-on incident information. Verification of data and incident response is the sole responsibility of Federal/State On-Scene Coordinators. Data contained within the FOIA Web Database is initial information only. All reports provided via this server are for informational purposes only. Data to be used in legal proceedings must be obtained via written correspondence from the NRC.

ATTACHMENT I

TDD NO. TO-0001-11-10-02 AND AMENDMENT A

EPA

U.S. EPA
Washington, DC 20460

START3 Technical Direction Document

Response Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-11-10-02
Contract: EP-W-06-042

! = required field

| | | |
|---|--|--|
| TDD Name: Emchem Glycol Spill | | ! Period: Base Period |
| ! Purpose: Work Assignment Initiation | | Verbal Date: 10/10/2011 |
| ! Priority: High | | ! Start Date: 10/10/2011 |
| Overtime: Yes | | ! Completion Date: 01/31/2012 |
| ! Funding Category: Removal Support | | Invoice Unit: |
| | | |
| ! Project/Site Name: Emchem Glycol Spill | | WorkArea: RESPONSE ACTIVITIES |
| Project Address: 4301 Rice Drier Road | | Activity: Emergency Response |
| County: | | Work Area Code: |
| City, State: Pearland, Texas | | Activity Code: RV |
| Zip: | | EMERGENCY CODE: <input type="checkbox"/> KAT <input type="checkbox"/> RIT |
| ! SSID: A6CS | | FPN: |
| CERCLIS: TXD0980750624 | | Performance Based: No |
| Operable Unit: | | |

| Authorized TDD Ceiling: | Cost/Fee | LOE |
|-------------------------|-------------|-----|
| Previous Action(s): | \$0.00 | 0.0 |
| This Action: | \$10,000.00 | 0.0 |
| New Total: | \$10,000.00 | 0.0 |

Specific Elements More specifically the contractor shall, - Collect facts regarding the discharge or release to include its source and cause, - Identify potentially responsible parties, - Identify the pathways to human and environmental exposure, - Analyze the potential impact on human health welfare and safety and the environment posed by the release of hazardous substances contaminants or pollutants and discharge of oil, - Identify active or historical facility processes or operations that may contribute to the release or threat of release of hazardous substances pollutants contaminants or discharge of oil, - Conduct deed and title searches

Description of Work:

Tier 1. Mobilize immediately to the site to assist TCEQ and EPA ERRS with emergency response activities to include: maintain logbook per SOP, air monitoring, initial assessment of off-site impact, document activities, photo document, draft POLREP, and review historic regulatory files to assist with assessment of facility. Coordinate with OSC John Martin.

Accounting and Appropriation Information

SFO: 22

| Line | DCN | IFMS | Budget/ FY | Appropriati on Code | Budget Org Code | Program Element | Object Class | Site Project | Cost Org Code | Amount |
|------|--------|------|------------|------------------------|--------------------|--------------------|-----------------|--------------|------------------|-------------|
| 1 | RSC031 | XXX | 11 | T | 6A00S | 302DC6C | 2505 | A6CSRV00 | C001 | \$10,000.00 |

| Funding Summary: | Funding |
|------------------|-------------|
| Previous: | \$0.00 |
| This Action: | \$10,000.00 |
| Total: | \$10,000.00 |

Funding Category
Removal Support

Section

- Signed by John Martin/R6/USEPA/US on 10/13/2011 05:55:17 PM, according to Cheng Wei Feng/sta

: John Martin

Date: 10/13/2011

Phone #:

Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 10/14/2011 01:21:00 PM, according to C

Project Officer: Linda Carter

Date: 10/14/2011

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 10/14/2011 01:21:00 PM, according

Contracting Officer: Cora Stanley

Date: 10/14/2011

Contractor Section - Signed by Robert Beck/start6/rfw-start/us on 10/15/2011 11:37:38 AM, according to

- ☒ No During the past three (3) calendar years has your company , or any of your employees that will
☐ Yes be working at this site , previously performed work at this site /facility?

Contractor Contact: Robert Beck

Date: 10/15/2011

EPAU.S. EPA
Washington, DC 20460**START3**
Technical Direction DocumentResponse Activities- REMOVAL
Funds (0001)
Weston Solutions, Inc.

TDD #: TO-0001-11-10-02

Amendment#:A

Contract: EP-W-06-042

! = required field ☐ Moved To EAS

| | |
|---|--|
| TDD Name: Emchem Corporation Glycol Spill | ! Period: Base Period |
| ! Purpose: Change TDD name and SSID | |
| ! Priority: High | ! Start Date: 10/10/2011 |
| Overtime: | ! Completion Date: 01/31/2012 |
| ! Funding Category: Removal Support | Invoice Unit: |
| ! Project/Site Name: Emchem Corporation Glycol Spill | |
| WorkArea: RESPONSE ACTIVITIES | |
| Project Address: 4301 Rice Drier Road | Activity: Emergency Response |
| County: | Work Area Code: |
| City, State: Pearland, Texas | Activity Code: RV |
| Zip: | EMERGENCY CODE: <input type="checkbox"/> KAT <input type="checkbox"/> RIT |
| ! SSID: 064L | FPN: |
| CERCLIS: TXD0980750624 | Performance Based: No |
| Operable Unit: | |

| Authorized TDD Ceiling: | Cost/Fee | LOE (Hours) |
|-------------------------|-------------|-------------|
| Previous Action(s): | \$10,000.00 | 0.0 |
| This Action: | \$0.00 | 0.0 |
| New Total: | \$10,000.00 | 0.0 |

Specific Elements More specifically the contractor shall, - Collect facts regarding the discharge or release to include its source and cause, - Identify potentially responsible parties, - Identify the pathways to human and environmental exposure, - Analyze the potential impact on human health welfare and safety and the environment posed by the release of hazardous substances contaminants or pollutants and discharge of oil, - Identify active or historical facility processes or operations that may contribute to the release or threat of release of hazardous substances pollutants contaminants or discharge of oil, - Conduct deed and title searches

Description of Work:**All activities performed in support of this TDD shall be in accordance with the contract and TO PWS.**

Amendment A corrects the Site/TDD name and also corrects the SSID to reflect 064L. There is no increase in cost/fee.

Tier 1. Mobilize immediately to the site to assist TCEQ and EPA ERRS with emergency response activities to include: maintain logbook per SOP, air monitoring, initial assessment of off-site impact, document activities, photo document, draft POLREP, and review historic regulatory files to assist with assessment of facility. Coordinate with OSC John Martin.

Accounting and Appropriation Information

| | | | | | | | | | | SFO: |
|------|-----|------|------------|---------------------------|--------------------|--------------------|-----------------|--------------|------------------|--------|
| Line | DCN | IFMS | Budget/ FY | Appropriati on Code | Budget Org Code | Program Element | Object Class | Site Project | Cost Org Code | Amount |
| 1 | | | | | | | | | | \$0.00 |

| Funding Summary: | Funding |
|------------------|-------------|
| Previous: | \$10,000.00 |
| This Action: | \$0.00 |
| Total: | \$10,000.00 |

Funding Category

Removal Support

Section

- Signed by John Martin/R6/USEPA/US on 10/21/2011 01:34:51 PM, according to Phyllis Caldwell/star

: John Martin

Date: 10/21/2011

Phone #:

Project Officer Section - Signed by Cora Stanley/R6/USEPA/US on 10/24/2011 06:25:08 AM, according to P

Project Officer: Linda Carter

Date: 10/21/2011

Contracting Officer Section - Signed by Cora Stanley/R6/USEPA/US on 10/24/2011 06:25:08 AM, according

Contracting Officer: Cora Stanley

Date: 10/24/2011

Contractor Section

Contractor Contact:

Date:
